

# Exhibit B

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

STERLING NATIONAL BANK

Plaintiffs,  
v.

Civil Action  
Case No. 07-CV-8709

**DEFENDANTS' ANSWER AND  
DEMAND FOR JURY TRIAL**

COMPUTER SOLVERS INC., JEROME N.  
GREENBERG and TERRI G. NOEL a/k/a TERRI  
LYNN GREENBERG a/k/a TERRI NOEL a/k/a  
TERRI L. GREENBERG, individually,  
Defendants.

Jerome Greenberg on behalf of himself herein answers as follows:

**THE PARTIES**

1. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 1 of the Complaint,
2. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 2 of the Complaint.
3. Defendant admits the information in paragraph 3 of the Complaint.
4. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 4 of the Complaint.

**JURISDICTION AND VENUE**

5. Defendant admits that this Court has original subject matter jurisdiction over this matter.
6. Defendant admits that venue is proper in this District.

**FACTUAL BACKGROUND COMMON TO ALL CLAIMS**

7. Defendant admits the information in paragraph 7 of the Complaint.
8. Defendant admits the information in paragraph 8 of the Complaint
9. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 9 of the Complaint.

10. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 10 of the Complaint.

11. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 11 of the Complaint.

12. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 12 of the Complaint.

13. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 13 of the Complaint.

14. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 14 of the Complaint.

15. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 15 of the Complaint.

**ANSWER TO CLAIMS FOR RELIEF  
COUNT I**

16. Defendant incorporates by reference his responses to paragraphs 1-15 as if set forth herein.

17. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 16 of the Complaint.

18. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 17 of the Complaint.

19. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 18 of the Complaint.

20. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 19 of the Complaint.

21. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 20 of the Complaint.

22. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 21 of the Complaint.

## **COUNT II**

23. Defendant incorporates by reference his responses to paragraphs 1-21 as if set forth herein.

24. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 22 of the Complaint.

25. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 23 of the Complaint.

26. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 24 of the Complaint.

27. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 25 of the Complaint.

## **COUNT III**

28. Defendant incorporates by reference his responses to paragraphs 1-25 as if set forth herein.

29. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 26 of the Complaint.

30. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 27 of the Complaint.

31. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 28 of the Complaint.

32. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 29 of the Complaint.

33. Defendant is without sufficient knowledge or information to confirm or deny the information in paragraph 30 of the Complaint.

## **COUNT IV**

34. Defendant incorporates by reference his responses to paragraphs 1-30 as if set forth herein.

35. Defendant denies the allegations of paragraph 31 of the Complaint.

36. Defendant denies the allegations of paragraph 32 of the Complaint.

37. Defendant denies the allegations of paragraph 33 of the Complaint.
38. Defendant denies the allegations of paragraph 34 of the Complaint.
39. Defendant denies the allegations of paragraph 35 of the Complaint.
40. Defendant denies the allegations of paragraph 36 of the Complaint.

### **DEFENSES**

#### **FIRST DEFENSE (FAILURE TO MITIGATE)**

Plaintiffs' claims are barred in whole or in part because Plaintiffs have failed to mitigate their damages, if any.

#### **SECOND DEFENSE (FAILURE TO STATE A CLAIM)**

Plaintiffs' allegations fail to state a claim that has not been addressed by the settlement agreement between Plaintiff and Defendant.

#### **THIRD DEFENSE (ESTOPPEL)**

Plaintiffs' claims are barred in whole or in part by the doctrine of estoppel.

#### **FOURTH DEFENSE (WAIVER)**

Plaintiffs' claims are barred in whole or in part by the doctrine of waiver.

#### **FIFTH DEFENSE (UNCLEAN HANDS)**

Plaintiffs' claims are barred in whole or in part by the doctrine of unclean hands.

#### **SIXTH DEFENSE (LACHES)**

Plaintiffs' claims are barred in whole or in part by the doctrine of laches.

#### **RELIEF REQUESTED**

WHEREFORE, Defendants respectfully request the following relief:

1. A judgment in favor of Defendant denying Plaintiffs all relief requested in their Complaint in this action and dismissing Plaintiffs' Complaint with prejudice;
2. That the Court award Defendants such other and further relief as the Court deems just and proper.

#### **DEMAND FOR JURY TRIAL**

In accordance with Fed. R. Civ. P. 38(b), Defendants demand a trial by jury on all issues so triable.

Date: November 27th, 2007

Respectfully submitted,

Jerome Greenberg, Pro Se  
549 Wingate Road  
Deridder, LA. 70634  
(757) 636-2074


### CERTIFICATE OF SERVICE

I, Jerome Greenberg, hereby certify that on , November 27, 2007  
served copies of Defendants' Answer and Demand for Jury Trial  
on the following parties by way of US Mail

Terri Noel  
433 Caren Drive  
Virginia Beach VA. 23452

Linda Mandel Gates  
Platzer, Swergold, Karlin. Levine  
Goldberg & Jaslow, LLP  
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11/27/07  
Date

  
Signature